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UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

21 UNITED STATES OF AMERICA,

22 Plaintiff,

23 v.

24 CHALONER SAINTILLUS,

25 Defendant.

26 Case No.: 2:20-cr-0213-KJM

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**DEFENDANT'S PARTIAL
OPPOSITION TO
GOVERNMENT'S MOTION IN
LIMINE #1 – MOTION TO ADMIT
BANK RECORDS**

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MOTION

33 The government seeks to admit over 100 pages of bank records in an effort
34 to show the defendant used a bank card tied to his bank account on 6 occasions to
35 purchase postage for packages mailed in this case. These bank records contain
36 thousands of other transactions that are completely irrelevant to this issue.

37 Accordingly, the irrelevant portions of the bank records must be redacted,
38 and the defendant objects to any other portions of the records being offered as
39 evidence in this case. Only the 6 occasions where the card was used to purchase

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41 Defendant's Partial Opposition to Govt's Motion in Limine #1

1 postage is relevant. Other debits, credits, and balances in the account are not
2 relevant.

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4 Dated: January 13, 2023 LAW OFFICES OF DAVID D. FISCHER, APC

5 /S/ David D. Fischer
6 DAVID D. FISCHER
7 Attorney for Defendant
8 CHALONER SAINTILLUS

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